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January 5, 1988

William G. Council
Executive Vice President

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NOZZLE LOAD INTERFACES
SDAR: CP-87-122 (INTERIM REPORT)

Gentlemen:

On November 25, 1987, we verbally notified your Mr. R. F. Warnick of a deficiency involving nozzle load stresses (for various nozzles) which may fail to meet FSAR limits. Our last interim report, TXX-7129, was submitted on December 28, 1987. This condition was discovered during seismic equipment qualification review activities and is reportable under the provisions of 10CFR50.55(e). The required information follows.

DESCRIPTION OF PROBLEM

During the review of seismic equipment qualifications, several installations have been observed wherein the as-built piping and/or nozzle loads, or mounting details exceed stress limits specified by the FSAR. Our evaluation, which has been completed for Unit 1, has identified the following overstressed conditions.

- a. All safety-related HVAC fan coil unit nozzles,
- b. The hydrogen purge exhaust filtration unit nozzles,
- c. The containment spray heat exchanger shell and support structure, and
- d. The emergency diesel generator inlet lube oil pressure strainer clip angles.

These conditions are the result of inadequate vendor design controls and design/procurement specifications. Our evaluation of the Unit 2 equipment installations is continuing.

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SAFETY IMPLICATIONS

Exceeding design limits could result in the failure or inoperability of the associated component. These conditions if left uncorrected could, in turn, adversely affect the safe shutdown capabilities and/or the ability to mitigate the consequences of an accident.

CORRECTIVE ACTION

Our specific corrective actions are as follows.

- a. Fan coil units will be corrected by addition of a flexible connection between the fan coil unit nozzle flange and the attached piping. This flexible connection will accommodate seismic inertia effects which were not considered in the original procurement specification.
- b. The hydrogen purge exhaust filter inlet nozzle flanges will be corrected by addition of a flexible connection between the flange and inlet piping.
- c. The containment spray heat exchanger support structure and mid lug connection will be modified to eliminate the overstress condition.
- d. The emergency diesel generator inlet lube oil pressure strainer clip angle overstress will be eliminated by the installation of additional clips to reduce the stress level per clip.

Repetition of similar problems will be precluded by the development of design procedures to assure equipment is seismically qualified in accordance with the design criteria as specified in the Design Basis Document (DBD).

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Our next report will be submitted no later than March 28, 1988, to provide a schedule for completion of the above corrective actions and the Unit 2 seismic equipment qualification review.

Very truly yours,

W.G. Council

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By: *D.R. Woodlan*

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